

EXHIBIT F

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ESTER LORUSSO,

PLAINTIFF,

ORIGINAL

-against-

Case No:

1:07 cv 03583-LBS

ALITALIA LINEE AEREE ITALIANE S.p.A.,

DEFENDANT.

-----X

DATE: January 8, 2008

TIME: 2:12 p.m.

EXAMINATION BEFORE TRIAL of the
Defendant, ALITALIA LINEE AEREE ITALIANE S.p.A.,
by a Witness, ANGELA ROSS, taken by the
Plaintiff, pursuant to Notice, and to the
Federal Rules of Civil Procedure, held at the
offices of The Ottinger Firm, P.C., 19 Fulton
Street, New York, New York 10019, before Nina
Velovic, a Notary Public of the State of New
York.

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the information contained because I provided
it.

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(Whereupon, the aforementioned
document was marked as Plaintiff's
Exhibit D for identification as of this
date by the Reporter.)

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Q. Do you recognize Exhibit D?

9

A. It's a letter informing you that
after we produced the list attached in A there
were two more people that resigned from the
service of Alitalia by the end of December of
2007. DeRienzo and D'Ascanio.

14

Q. Did either of those people leave
pursuant to one of the early retirement
packages that you described?

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A. No, they resigned.

18

Q. How many people were in Alitalia's
New York office in December of 2007?

20

A. Less than 100.

21

Q. How many?

22

A. I don't know. I would estimate 60.

23

Q. What's the approximate difference
in size in the staff from December 2007 to
January 2004, does that make sense to you?

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A. New York or throughout?

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Q. New York.

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A. We are probably 70 percent of what
we used to be in 2004.

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Q. What's the reason for the change in
size?

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A. People left for the early
retirement, people resigned and a handful of
people that were terminated for other reasons.
And most of the people who left were not
replaced.

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Q. Why weren't they replaced?

14

A. I have no idea.

15

Q. Did you look at any of the early
retirement packages in preparation for this
deposition?

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A. I glanced at them, yes.

19

Q. Could you show them to me?

20

MR. KORAL: Objection. What do you
mean could she show them to you?

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Q. Do you have them with you?

23

MR. KORAL: She's not consulting --

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MR. OTTINGER: She didn't say she
did.